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July 30, 2025

VIA ECF

The Honorable Jennifer L. Rochon
 U.S. District Court for the Southern District of New York
 Daniel Patrick Moynihan U.S. Courthouse
 500 Pearl Street, Room 1920
 New York, New York 10007

Re: *Cengage Learning, Inc. v. Google LLC*, No. 1:24-cv-04274-JLR-BCM
Defendant's Motion for Leave to File Omnibus Letter Motion

Dear Judge Rochon:

The parties filed a Joint Status Report with their respective positions on the status of fact discovery on July 25, 2025 (Dkt. 138). Google has met and conferred with Plaintiffs on numerous occasions about the various discovery issues outlined by Google in the Joint Status Report and expects that most of these issues will be the subject of motion practice. To facilitate the Court's review, rather than submit separate filings raising numerous discovery issues, Google requests leave to file one omnibus letter motion, no more than 15 pages, to be filed August 5, 2025. This page limit and deadline is consistent with Plaintiffs' request for leave to file a similar motion (Dkt. 138 at 3), which the Court granted (Dkt. 140). Google requests the Court set the same briefing schedule and hearing date for Google's omnibus letter motion and Plaintiffs' response to the same. Google reached out to Plaintiffs to seek their position on this request; Plaintiffs noted that they oppose. In light of the existing consolidated discovery briefing, Google believes that a single filing for Google's discovery disputes will be more convenient for the Court and preserve judicial resources.

We thank the Court for its consideration of this request.

Respectfully,

/s/ Sy Damle

Sarang Vijay Damle
 of LATHAM & WATKINS LLP

cc: All Counsel of Record (via ECF)